

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
TYLER DIVISION

QUENTIN T. LAWSON, on behalf of himself
and all others similarly situated,

Plaintiff,

v.

KINGSTON DATA AND CREDIT
INTERNATIONAL, INC.

Defendant.

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Civil Action No. 6:19-cv-00255-JCB-KNM

STIPULATION OF DISMISSAL WITH PREJUDICE

Pursuant to Federal Rule of Civil Procedure 41(a), Plaintiff Quentin T. Lawson (“Plaintiff”) files this Stipulation of Dismissal with Prejudice (the “Stipulation”), and would respectfully show as follows:

1. Plaintiff commenced this action against defendant Kingston Data and Credit International, Inc. (“Defendant”) on June 12, 2019. Plaintiff no longer desires to pursue any of his claims against Defendant and, pursuant to FED. R. CIV. P. 41(a), hereby dismisses all claims that were or could have been asserted in this action with prejudice.

2. Through its counsel’s signature below, Defendant agrees and consents to Plaintiff’s dismissal pursuant to FED. R. CIV. P. 41(a)(1)(A)(ii).

3. While filed as a putative class action, no class has been certified as contemplated by FED. R. CIV. P. 23(e). This case does not involve a derivative action under FED. R. CIV. P. 23.1, or an action related to an unincorporated association under FED. R. CIV. P. 23.2, and a receiver has neither been requested nor appointed in this case.

4. This case is not governed by any federal statute that requires a court order for dismissal of the case.

5. Plaintiff has not voluntarily dismissed any federal or state court suit based on or including the same claims as those presented in this case.

6. This dismissal is with prejudice to all claims that Plaintiff asserted, or that he could have asserted, in this action.

Accordingly, Plaintiff Quentin T. Lawson respectfully prays that the Court enter an order finally dismissing all claims with prejudice.

Respectfully submitted,

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